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October 13, 2022

VIA ECF

Hon. Ronnie Abrams, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Blitz v. BLDG Mgmt Co. Inc.*, 20-cv-5462 (RA) (RWL)

Dear Judge Abrams:

Our firm represents Defendants BLDG Management Company, Paul Howard and Amy Wolf ("Defendants") in the above-referenced matter.

We write to request that the date to file Defendants' opposition to Third Party Defendant Wendy Newman's September 30, 2022 summary judgment motion dismissing Defendants' claims be adjourned from October 14, 2022 through and including November 30, 2022 and that Ms. Newman have three weeks in which to reply to said opposition. Ms. Newman's counsel consents to these adjournment requests.

In light of the above-requested schedule for Ms. Newman's motion, Defendants also request that the date to file their summary judgment motion dismissing the claims of Plaintiff Blitz be extended from October 31, 2022 through and including November 30, 2022.

We make these requests to allow Defendants sufficient time to coordinate and complete work on both motions due to the unexpectedly early departure of my colleague Daniella Adler for maternity leave to care for her baby born September 30, 2022, and reasonable time for a substitute colleague to familiarize himself with this matter to assist the undersigned in making and opposing the parties' respective dispositive motions.

I attempted yesterday to contact Plaintiff Richard Blitz by telephone to obtain his consent to this request to extend the schedule to file a summary judgment motion on his claims. He has

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not returned my call. So as not to delay this request, Defendants are filing this request now in light of the October 14 deadline for filing opposition for Ms. Newman's motion.

Respectfully,

/s/ Eric D. Witkin
Eric D. Witkin

cc: All Counsel (Via ECF)
Richard Blitz (via Federal Express)

Application granted.

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'RA', is written over a horizontal line.

Hon. Ronnie Abrams
United States District Judge
10/14/2022